

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

NATIONAL RIFLE ASSOCIATION
OF AMERICA,

Plaintiff and Counter-Defendant,

and

WAYNE LAPIERRE,
Third-Party Defendant,

V.

ACKERMAN MCQUEEN, INC.,
Defendant and Counter-Plaintiff,

and

MERCURY GROUP, INC., ET AL.

Defendants.

Case No. 3:19-cv-02074-G

JOINT STIPULATION ON BRIEFING SCHEDULE

On October 30, 2019, the Court ordered that the parties “shall meet and confer concerning a reasonable schedule for briefing any additional motion to dismiss pursuant to Fed. R. Civ. P. 12(b)(6) and present such schedule to the court no later than November 1, 2019, for the court’s approval.” *See* ECF 22. The Parties have conferred and agreed to the following:

- Counsel of record for Ackerman McQueen, Inc. agrees to accept service of process of the National Rifle Association of America's First Amended Complaint on behalf Defendants Melanie Montgomery and Bill Winkler as of October 30, 2019;

- Defendants' responsive pleadings, including any answers and/or Fed. R. Civ. P. 12(b) motions to the National Rifle Association of America's First Amended Complaint, shall be filed no later than November 15, 2019; and
- The Parties agree to comply with the Northern District of Texas Local Rules regarding the filing of any response or reply briefs to any motion, including any renewed motion to dismiss the National Rifle Association of America's First Amended Complaint.

The Parties respectfully request that the Court enter the enclosed order setting forth the Parties' agreed briefing schedule.

Dated: November 1, 2019.

Respectfully submitted,

/s/ Brian Vanderwoude

Jay J. Madrid, Esq.

Texas Bar No. 12802000

madrid.jay@dorsey.com

Douglas S. Lang, Esq.

Texas Bar No. 11895500

lang.doug@dorsey.com

J. Brian Vanderwoude, Esq.

Texas Bar No. 24047558

vanderwoude.brian@dorsey.com

Christina M. Carroll, Esq.

Texas Bar No. 24092868

carroll.christina@dorsey.com

DORSEY & WHITNEY LLP

300 Crescent Court, Suite 400

Dallas, Texas 75201

(214) 981-9900 Phone

(214) 981-9901 Facsimile

**ATTORNEYS FOR DEFENDANTS AND
COUNTER-PLAINTIFF**

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with counsel for the NRA regarding the relief sought herein and the NRA agrees to same.

/s/ Brian Vanderwoude

J. Brian Vanderwoude

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2019, I filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas. I hereby certify that I have served the document on all counsel and/or pro se parties of record by a manner authorized by Federal Rules of Civil Procedure 5(b)(2).

/s/ Brian Vanderwoude

J. Brian Vanderwoude